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Comments: February 1, 2024

United States Forest Service

Director, Ecosystem Management Coordination

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Washington, DC 20250-1124

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Comments submitted via: <https://cara.fs2c.usda.gov/Public//commentInput?Project=65356>

Dear Director,

My name is Darrell Brown and I am the President of the Otero County Cattleman's Association (OCCA) in Otero County, New Mexico. I am writing on behalf of the members of OCCA in regards to Federal Register / Vol. 88, No. 243 / Wednesday, December 20, 2023 / Notices, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

In reading the above-mentioned Federal Register Notice (FRN), OCCA takes issue with several items contained within the FRN. OCCA is not alone in their opinion of this FRN. Recently an article was printed in the Wall Street Journal by the Editorial Board on December 21, 2023 that said: "The U.S. Forest Service is proposing, for the first time, to amend simultaneously all of its forest management plans to effectively ban logging on nearly 25 million acres of "old growth" forests. This is a land grab if there ever was one. The agency claims that conserving older trees will fight climate change since they suck up and store CO2. Not if they go up in smoke." We could not have said it better ourselves.

The FRN states that: "Vegetation management within oldgrowth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons."

The primary reason that most of the National Forest System lands were reserved was for "the purpose of growing, tending, harvesting, or regeneration of trees for economic reasons" and to benefit the American people. Current statutes do not exempt old-growth forests from their intended purpose. Decades of unsuitable federal forest management have created unhealthy, overcrowded, and dangerous forests. Wildfires are destroying a valuable commodity, habitat, livelihoods and, in some instances, private property. State and tribal lands adjoining National Forest System lands are increasingly at risk of wildfires.

The FRN says that the proposed amendment to the current forest plan is: "To retain and promote the development of resilient old-growth conditions adjacent to existing oldgrowth forest conditions, including for the purposes of reducing fire hazard, altering potential fire spread or fire severity, or reducing potential insect or disease outbreak that may spread to adjacent old-growth forest."

Promoting the expansion of old-growth forest conditions for the above stated purposes is absurd. The lack of proper tree and debris management/removal only enhances the fire hazard, fire spread and/or severity, as well as causing an increase of insect infestation and/or disease outbreak. The intended preservation of old-growth forests will ultimately cause devastation, destruction and death of both plants and animals...and possibly humans.

Executive Orders issued by a President are not law and are unenforceable when in conflict with congressionally passed statutes. The National Forest System lands are multiple use lands as mandated by law and must be used as such. Timber harvest, thinning, proper prescribed burning, livestock grazing and recreation must not be diminished or eliminated. In fact, some of these uses must be expanded upon in order to try to reestablish a healthy, viable forest.

OCCA's recommendation for an "alternative" is to withdraw this proposed amendment to the forest plan and to instruct the United States Forest Service (USFS) employees to immediately begin sensible and sustainable timber harvest and thinning of the National Forest System lands before they all go up in ashes emitting untold amounts of the dreaded CO2.

Thank you.

/s/Darrell Brown
President of the Otero County Cattleman's Association
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cc: Otero County Commission
Otero County Attorney R.B. Nichols
Secretary of Agriculture Tom Vilsack
New Mexico Secretary of Agriculture Jeff Witte
Yvette Herrell